

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IBRAHIM TURKMEN, et al.,

Plaintiffs,

- against -

JOHN ASHCROFT, et al,

Defendants.

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02 CV 2307 (JG) (SMG)

**NOTICE OF JOINT MOTION
FOR LEAVE TO INTERVENE
AND TO AMEND THE
COMPLAINT**

ECF CASE

PLEASE TAKE NOTICE that proposed intervenors Ahmer Iqbal Abbasi, Anser Mehmood, Benamar Benatta, Ahmed Khalifa, Saeed Hammouda and Purna Raj Bajracharya move this Court, pursuant to Rule 24 of the Federal Rules of Civil Procedure, for leave to intervene as plaintiffs, and to file the proposed Fourth Amended Complaint which, pursuant to the Protective Order entered August 5, 2005, they have served separately on the parties and are submitting to the Court for filing under seal.

The proposed intervenors are members of the class defined in the complaint, and have claims defined as class claims. Thus, they have an interest relating to the subject matter of this action; disposing of the action will impair or impede their ability to protect their interest; and their interest is not adequately represented by existing parties. Alternatively, they have claims that share with the action common questions of law and fact.

PLEASE TAKE FURTHER NOTICE that plaintiffs Ibrahim Turkmen and Akhil Sachdeva also move this Court, pursuant to Rule 15 of the Federal Rules of Civil Procedure, for leave to amend their complaint as set forth in the proposed Fourth Amended Complaint which, pursuant to the Protective Order entered August 5, 2005, they are have served separately on the parties and are submitting to the Court for filing under seal.

Pursuant to the Order of this Court entered March 18, 2010, opposing papers must be served and filed on or before April 22, 2010, reply papers must be served and filed on or before May 6, 2010, and the motion will be heard at 2 p.m. on May 26, 2010.

Dated: New York, New York
March 25, 2010

Respectfully submitted,

s/ Rachel Meeropol
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William Quigley¹
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